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*CHINA FREE PRESS*

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

ZHANG ZIYI, an individual,  
Plaintiff,

vs.

CHINA FREE PRESS, a North  
Carolina non-profit corporation  
doing business as BOXUN NEWS;  
WEICAN NULL MENG, an  
individual known as WATSON  
MENG and also WEICAN  
“WATSON” MENG; and DOES 1-  
25, inclusive,  
Defendants.

Case No. CV 12-5216-DMG (PLA)

**DECLARATION OF  
WEICAN “WATSON” MENG**

Action Filed: June 14, 2012

**DECLARATION OF WEICAN “WATSON” MENG**

I, Weican “Watson” Meng, declare as follows:

1. I am the founder of China Free Press, Inc. (“China Free Press”), a non-profit corporation devoted to promoting free speech and democracy in China, and Yeeka LLC (“Yeeka”), which publishes Boxun News (“Boxun”), a website. I make this declaration in order to set forth certain facts regarding these two entities. I have personal knowledge of the matters set forth below. I am fully familiar with the facts and circumstances set forth herein. The facts stated below are true of my own personal knowledge, except where indicated that they are upon information and belief, and, if called to testify, I could and would competently testify thereto.

**My Background**

2. I grew up in Anguo, Hebei, China. I received a BS in electronic engineering from Hebei Institute of Technology in 1986, and an MS in economics from Nankai University in 1992. I was a fellow of the America-China Economics Training Center at People’s University in China, sponsored by the Ford Foundation, in 1989-1990.

3. While in China, I worked as an engineer for Baoding Measurement Center, and as an accountant and financial manager for Motorola and Unilever.

4. In 1996, I came to the United States to enter the graduate program at the State University of New York - Albany. I later transferred to Rochester Institute of Technology, where I received a Master’s Degree in Information Systems in 1998.

5. From 1999-2000, I was the Chief Technology Officer at Thinkersgroup, a high-tech company in Long Island, New York.

6. I started my own news reporting site, boxun.com, in March 2000, while I was working for Thinkersgroup. Boxun is a website which covers various China-related topics, focusing on political news and human rights abuses. Since its inception, Boxun has grown to be a major source of uncensored news in China.

1           7.     From 2001-2002, I worked part time as a website consultant for Human  
2 Rights Watch and Human Rights in China, both in New York.

3           8.     I received an MBA from Duke University in 2005.

4           9.     I was a Knight Fellow at Stanford University from 2008-2009.

5           **Yeeka**

6           10.    I formed Yeeka, which is organized under Delaware law, in 2006. Its  
7 function is to publish Boxun and any other websites I may develop in the future. A  
8 true and correct copy of Yeeka's Certificate of Formation is annexed as Exhibit C.

9           11.    I am the owner and administrator of Boxun and one of its four editors.  
10 We have about 30 reporters – most in mainland China and a few in Hong Kong and  
11 New Zealand. All of the editors and reporters are independent contractors. Yeeka  
12 has no employees.

13          12.    Yeeka has no officers, directors, employees or contractors other than  
14 those listed in the preceding paragraph.

15          **Yeeka and China Free Press**

16          13.    I founded Yeeka and China Free Press at different times and for  
17 different purposes. As noted above, I founded Yeeka (a for-profit corporation) in  
18 2006 as a business entity to operate Boxun. I founded China Free Press (a non-  
19 profit) in 2004 as an entity that would provide free hosting for many Chinese  
20 websites on its servers, thereby allowing writers and reporters in China to exercise  
21 free speech. Boxun is simply one of the many news reporting websites hosted on  
22 CFP's servers.

23          14.    CFP has no involvement whatsoever in operating Boxun or developing  
24 Boxun's content. CFP does not edit, review or otherwise exercise editorial rights  
25 with respect to articles published on Boxun. Although I am a CFP Board Member,  
26 my involvement with Boxun and Yeeka is completely separate from my duties as a  
27 director on the Board of CFP. I did not discuss the content of the articles that  
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1 Plaintiff takes issue with in this case with anyone at CFP, including my fellow  
2 Board Members, prior to or at the time of publication.

3 15. Other than me, Yeeka and China Free Press have no employees,  
4 contractors, officers or directors in common. Yeeka is not involved in CFP's  
5 activities in any way.

6 16. Although the two entities share a post office box, they do not share  
7 offices. Yeeka's office is my home in Durham, North Carolina. China Free Press'  
8 office is a small rented office space, also in Durham. Their business and operations  
9 are completely separate.

10 17. China Free Press is fully funded by grants from the National  
11 Endowment for Democracy since 2005. The annual grant amount is currently  
12 \$220,000.

13 18. Yeeka is fully funded by a grant administered by an international non-  
14 profit organization based and registered in France, which has no connection at all  
15 with the National Endowment for Democracy or China Free Press. That  
16 organization has requested that we not publicize its support; however, if the Court  
17 finds that it is necessary to identify the organization, I will ask my counsel to seek  
18 the Court's permission to do so confidentially. I received a three-year grant from  
19 the organization in 2009 in the amount of \$117,000 per year and renewed my  
20 application for a new grant in 2012.

21 19. Yeeka and China Free Press have separate bank accounts – a  
22 requirement of their respective grantors' – and their books and records are kept  
23 separately. None of their funds are commingled or diverted from one entity to the  
24 other. Neither entity has paid the expenses or debts of the other. Salaries and other  
25 expenses for each entity are paid from its own account. I am the only person who  
26 draws a salary from both entities.

27 20. The entities have used different lawyers and accountants.  
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1           21. In short, Yeeka (which publishes Boxun) and China Free Press are  
2 completely separate and have different accounts, books, offices, personnel,  
3 operations and purposes. Neither entity controls or manages the other. Neither I nor  
4 anyone else has ever used one to disguise the actions of another or to avoid  
5 responsibility for the other's conduct. They are separate in every sense.

6  
7           I declare under penalty of perjury under the laws of the United States of  
8 America that the foregoing is true and correct.

9 Executed this 7th day of September, 2012 at Durham, North Carolina.

10  
11 By:  \_\_\_\_\_


12 Weican "Watson" Meng  
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# EXHIBIT C

STATE *of* DELAWARE  
LIMITED LIABILITY COMPANY  
CERTIFICATE *of* FORMATION

- First: The name of the Limited Liability Company is: YEEKA LLC
- Second: The address of its registered office in the State of Delaware and the name of its registered agent is Agents and Corporations, Inc., Suite 600, One Commerce Center, 1201 Orange Street, Wilmington, New Castle County, Delaware, 19801.
- Third: This Limited Liability Company may establish or provide for the establishment of one or more designated series of members, managers or limited liability company interests having separate rights, powers or duties with respect to specified property or obligations of the limited liability company or profits and losses associated with specified property or obligations, and any such series may have a separate business purpose or investment objective.

**In Witness Whereof**, the undersigned have executed this Certificate of Formation this 16<sup>th</sup> day of January, 2006.

By: 

Name: Robert Tonino